

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE:

Andre Bisasor

Debtor,

Chapter 13

Case No.: 15-13369

EMERGENCY MOTION TO EXTEND THE TIME FOR FILING DOCUMENTS

I, Andre Bisasor, hereby request this Honorable Court to extend the deadline to file documents up until Monday October 5, 2015 because I have not been able to meet with my attorney David G. Baker as he has been hospitalized since last Wednesday September 23, 2015, and he continues to be hospitalized until this day. Last week Wednesday, Attorney Baker made a motion to this Court to extend time to file documents until today, Monday September 28, 2015, hoping that he would be released from the hospital by or before today. Unfortunately, Attorney Baker has been hospitalized for longer than first anticipated and his situation is apparently more serious than was first contemplated. I have had only intermittent email contact with him since last week and so I received information that he was having MRI's and other testing procedures done but I have been unable to communicate with him verbally due to limited phone access at the hospital and given his overall medical condition and lack of availability. As a result, I have not been able to meet with or speak with him since last week Tuesday and no progress has been made towards being able to properly complete the required schedules and forms. Consequently, I contacted the Bankruptcy Court today and spoke with a clerk, named Leah Kane, who informed Judge Feeney's session of this matter and she confirmed that another motion to extend time should still be sent in today eventhough one was previously submitted last week on the same subject matter, and granted. She also confirmed that I could fax such a motion, under the

circumstances, and advised me that I should also contact the Chapter 13 trustee regarding the upcoming creditor's meeting. So I contacted the trustee's office and was granted an extension as long as I make a first payment to the trustee today, which I did today using the online system and sent a confirmation of that payment to the trustee office already. Ms. Leah Kan also tried contacting attorney baker but she was unable to reach him. Therefore, given the above, I am filing this emergency request to extend time to allow for my attorney to complete his medical treatment in the hospital, to recover from his medical situation and to resume meeting with me to finish preparations to submit the documents.

WHEREFORE, I hereby humbly request this Honorable Court grant my request and or other relief that the Court deems just proper.

Respectfully Submitted,
The Debtor,

Andre Bisasor

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Dated: September 28, 2015